

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RINA OH n/k/a RINA OH AMEN,
Plaintiff,

Case No.: 1:21-cv-08839-NRB

v.

**PROPOSED DISCOVERY
ORDER ON CONSENT**

VIRGINIA L. GIUFFRE,

Defendant

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It is hereby ORDERED that:

1. The parties shall serve their initial disclosures no later than June 22, 2022.
2. The parties shall serve their initial document requests and interrogatories no later than July 22, 2022.
3. The parties shall file a joint status report with the Court on July 29, 2022.
4. Any motions to amend the pleadings or to join any additional parties shall be filed no later than August 5, 2022.
5. The parties shall confer and stipulate as to a protocol regarding the production of documents and electronically stored information no later than August 5, 2022.
6. All fact discovery shall be completed no later than September 30, 2022.
7. The parties shall file a joint status report with the court on September 30, 2022.
8. Expert discovery shall be conducted on the following schedule:
 - a. Any Plaintiff's expert reports shall be served no later than October 14, 2022.
 - b. Defendants' rebuttal reports shall be served no later than November 18, 2022.
 - c. Expert discovery shall be completed no later than December 9, 2022.

9. A pre-motion letter shall be submitted to the Court pursuant to Judge Naomi Reice Buchwald's individual court rules by December 20, 2022.
10. Any dispositive motion to be filed by January 20, 2023. If no dispositive motions are filed, the parties shall submit joint status reports to the Court, regarding the case and the readiness of the case for trial.
11. The parties may stipulate to modify interim deadlines in this Scheduling Order, without seeking prior leave of Court, except that the parties shall file joint status reports as provided in this schedule on the dates agreed.

DATED: New York, NY
May __, 2022

SO ORDERED

Hon. Naomi Reice Buchwald
United States District Judge